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U.S. DISTRICT COURT  
SAVANNAH DIV.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

FREDERICK GORHAM  
(PETITIONER)

CASE NO: CV400-276  
UNDERLYING: CR497-181

vs.

UNITED STATES OF AMERICA  
(RESPONDENT)

TRAVERSE TO GOVERNMENT'S SUPPLEMENTAL RESPONSE  
TO MOVANT'S 28 U.S.C. 2255 MOTION

Comes Now, Frederick Gorham, hereinafter Movant, to show this court the following:

Movant originally filed his motion pursuant to Title 28 U.S.C. § 2255 on 10-11-00. He then supplemented his filing pursuant to Fed. Rules of Cv. P., Rule 15, on 11-16-00.

From the inception of the proceedings in the case at bar, the Government has displayed an alarming tendency to avoid, misdirect, misquote, and proffer incorrect conclusions in most their pleadings as clearly indicated in all of Movant's responses to said pleadings.

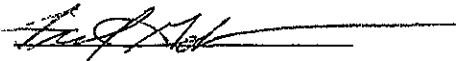
Now, with willful indifference and knowing disregard for Federal Rules and Procedure, the Government is attempting to supplement their original response. Specifically, Federal Rules of Civil Procedure, Rules 12(a) and 15(d) procedurally bar this attempt to supplement as all the material contained in the pleading was available to the government all along and should have been presented in the original response of 12-1-00. The Government's flagrant flouting of the Rules set forth for all parties to follow is contemptuous in nature. The Government and its agents are far more learned than Movant, but it is with certainty that Movant states that if it were he attempting to plead something barred by time and procedural rules, the Government would be the first to cite it as a violation.

Movant is merely proffering for the same or similar enforcement of said rules.

Wherefore, Movant prays this court for the following relief:

1. To deny the government's supplemental motion filed on 6-28-01 as untimely and barred for content that was always available to be presented, in clear violation of Fed. Civ. Rules 12 and 15.
2. In the alternative, to order Movant to respond with timeliness as provided by the rules and this court.
3. For any and all such further relief this court deems just and proper.

Respectfully submitted,

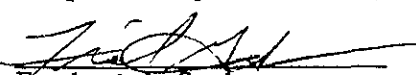


Frederick Gorham  
#09593-021  
Federal Medical Center  
P.O. Box 1600  
Butner, NC 27509

PLEA FOR LIBERAL CONSIDERATION

Movant Gorham respectfully moves the Honorable Court to GRANT all liberal considerations with respect to this action pursuant to HAINES v. KERNER, 4040 U.S. 519, 30 L. Ed. 2d 652, 92 S.Ct. 594, as Movant is not an attorney and has not attended any law school, nor has any professional training with respect to the filing of legal pleadings.

Respectfully submitted,

  
Frederick Gorham  
#09593-021  
Federal Medical Center  
P.O. Box 1600  
Butner, NC 27509

CERTIFICATE OF SERVICE


I, **Frederick Gorham**, swear I have deposited into the U.S. Postal box at Federal Medical center Butner, N.C., copies of the enclosed Motion for the below named party:

Mr. Carlton Bourne  
Assistance U.S. Attorney  
100 Bull Street, Suite 201  
Savannah, GA 31401

This 10<sup>th</sup> day of July 2001.

I also request a stamped filed copy be sent to me in the self addressed stamped envelope enclosed herein.

Respectfully submitted,

  
**Frederick Gorham**  
#09593-021  
Federal Medical Center  
P.O. Box 1600  
Butner, NC 27509